

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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Richard Sposato,

Plaintiff,

v.

**RESPONSE TO  
REQUEST FOR ADMISSIONS  
(GTS/MJK)**  
Case No.: 5:23-cv-364

Matthew W. Ryan, individually and in his official capacity,

Defendant.

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Defendant, Matthew W. Ryan, individually and in his official capacity, by and through his attorneys, Sugarman Law Firm, LLP, hereby respond to Plaintiff's Request for Admissions dated January 15, 2025, as follows:

1. Admit that on June 19, 2021 at approximately 2:00 a.m., you were working your law enforcement shift for the Village of Solvay Police Department.

**Response: Admit**

2. Admit that on June 19, 2021, approximately 2:00 a.m., you were parked in front of Patrick's Dry Cleaners (now Brian's Dry Cleaning).

**Response: Admit that Officer was parked in the 2200 Block of West Genesee Street at approximately 2:15 a.m.**

3. Admit that on June 19, 2021, you saw a maroon colored used automobile (Plaintiff's car) pull up to the stop light on Genesee Street and Fay Road, with its lights not fully deployed.

**Response: Admit that Officer observed a Maroon Honda Accord travelling on West Genesee Street without its headlights on. The Officer cannot admit or deny the characterization of an "used automobile".**

4. Admit that further, as the light turned green and Plaintiffs car left the light, you started following this car because its lights were not fully turned on.

**Response: Admit that one of the reasons the Officer followed the plaintiff's car was because the headlights of the vehicle were not on. The Officer continued to follow the vehicle for other reasons also.**

5. Admit that as Plaintiffs car immediately left its parked position, it did not squeal the tires.

**Response: The Officer is unable to admit or deny as the request is unclear what parked position is being referenced.**

6. Admit that you followed Plaintiff onto his mom's (sic) driveway located at 510 North Orchard Road with your lights turned on.

**Response: Admit that the Officer pursued the plaintiff's vehicle with emergency lights activated to the address of 510 North Orchard Road and is unable to admit or deny with personal knowledge of whom the plaintiff's mother is.**

7. Admit that after Plaintiff pulled in his mom's (sic) driveway and exited his car, Plaintiff started walking to the side door of his mom's house, which is the entryway to the garage/house.

**Response: The Officer is unable to admit or deny with personal knowledge of who the plaintiff's mother is. Deny the characterization that the plaintiff walked to the entryway to the house/garage as the Officer observed the plaintiff running in the driveway away from the Officer.**

8. Admit that on June 19, 2025, as Plaintiff reached for the side door, you shot the Plaintiff in the back with your issued taser gun.

**Response: Admit the Officer attempted unsuccessfully to deploy the department issued Taser on the plaintiff after issuing commands to the plaintiff.**

9. Admit that roughly an hour or so after the incident of Plaintiff being shot in the back, walking away from you parked in his mom's driveway, you called Plaintiff's cell phone at least 2 times to try to talk with the Plaintiff, now after 3:00 a.m.

**Response: Admit that the Officer contacted the plaintiff via cell phone to seek cooperation with the plaintiff and confirm with the plaintiff that he was not struck with a taser deployment and that he was offered and denied the need for any medical treatment.**

10. Admit that after contacting Plaintiff by phone on June 19, 2021, you called Plaintiff again later that day, or on June 20, 2021, recommending Plaintiff come down to the station and turn himself in by the evening of June 20, 2021, that you would be there to book Plaintiff.

**Response: Admit.**

11. Admit that around 7:00 p.m. on June 20, 2021, the Plaintiff came down to the Solvay Police station on his own accord, located at 507 Charles Avenue, where he sat in a cell for some time at the station during processing.

**Response: The Officer can neither admit nor deny this request as he has no personal knowledge of this request.**

12. Admit that on the evening of June 20, 2021, while Plaintiff was sitting in a cell at the station, you arrested, charged, booked and fingerprinted Plaintiff (see Attachment 1).

**Response: Admit the plaintiff was arrested, and released and issued appearance tickets to return to Court to commence the criminal proceeding at a later date.**

Dated: February 12, 2025



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Paul V. Mullin, Esq.  
Bar Roll No.: 2033520

**SUGARMAN LAW FIRM, LLP**

*Attorneys for Matthew W. Ryan, individually  
and in his official capacity*  
211 West Jefferson Street  
Syracuse, New York 13202  
Telephone: (315) 474-2943  
[pmullin@sugarmanlaw.com](mailto:pmullin@sugarmanlaw.com)

TO: Richard Sposato, Pro Se  
c/o 510 North Orchard Road  
Solvay, New York 13209  
Telephone: (315) 412-1776

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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Richard Sposato,

Plaintiff,

v.

Case No.: 5:23-cv-00364  
(GTS/MJK)

Matthew W. Ryan, individually and in his official  
capacity,

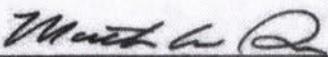
Defendant.

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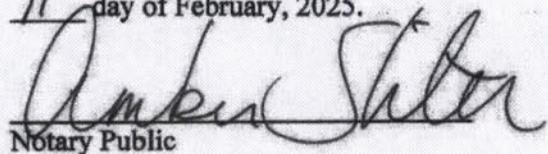
**INDIVIDUAL VERIFICATION**

STATE OF NEW YORK )  
                          )ss:  
COUNTY OF ONONDAGA)

Matthew W. Ryan, Individually and in his Official Capacity, being duly sworn, deposes  
and says that deponent is the Defendant in the within action; that deponent has read the foregoing  
Request for Admission and knows the contents thereof; that the same is true to deponent's own  
knowledge, except as to the matters therein stated to be alleged upon information and belief, and  
as to those matters deponent believes it to be true.

  
Matthew W. Ryan

Sworn to before me this  
11 day of February, 2025.

  
Notary Public

AMBER SLITER Notary Public - State of New York No. 01SL0006749 Qualified in Oswego County My Commission Expires 04/28/2027
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STATE OF NEW YORK )

ss.

COUNTY OF ONONDAGA )

### Affirmation of Service

On this 15th day of January, 2025, I, Richard-Louis: Sposato, along with this Affirmation of Service, served a true and correct copy of the within **Request For Admissions**, enclosed in a properly addressed white wrapper, postage fully prepaid, under the exclusive care and custody of the United States Postal Service, on the following attorney for Matthew Ryan:

Sugarman Law Firm, LLP  
*Attn: Paul V. Mullin*  
211 W. Jefferson St., Suite 20  
Syracuse, NY 13202

USPS Certified Return Receipt #9589 0710 5270 2108 6625 76

I, Richard-Louis: Sposato, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
Richard-Louis: Sposato

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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Richard Sposato, a.k.a. Richard-Louis: Sposato,	)	Civil Case No.: 5:23-cv-364 (Judges Initials) GTS / MJK
	)	
Plaintiff,	)	
v.	)	REQUEST FOR ADMISSIONS DEFENDANT RYAN
Matthew W. Ryan, individually and in his official capacity,	)	
Defendant.	)	
	)	

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Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiff Richard Sposato, hereby requests that Defendant Matt W. Ryan admit, for the purposes of this action only, the truth of the following statements within thirty (30) days of service. Failure to respond within this time will result in these matters being deemed admitted under Rule 36(a)(3).

**INSTRUCTIONS**

1. Each request must be admitted, denied, or the responding party must state in detail why they cannot truthfully admit or deny it.
2. If denying a request, the response must fairly address the substance of the request.
3. If the responding party asserts a lack of knowledge or information, the party must state that they have made reasonable inquiry and that the information known or readily obtainable is insufficient to enable them to admit or deny.

**DEFINITIONS**

1. “Document”: Includes any written, recorded, or graphic material, whether electronically stored or otherwise.

2. "You" or "Your": Refers to the responding party, their agents, employees, attorneys, or anyone acting on their behalf.

### **REQUEST FOR ADMISSION**

1. Admit that on June 19, 2021, approx 2:00 am, you were working your law enforcement shift for the Village of Solvay Police Department.
2. Admit that on June 19, 2021, approx 2:00 am, you were parked in front of Patrick's Dry Cleaners (now Brian's Dry Cleaning).
3. Admit that on June 19, 2021, you saw a maroon colored used automobile (Plaintiff's car) pull up to the stop light on Genesee St. and Fay Rd, with its lights not fully deployed.
4. Admit that further, as the light turned green and Plaintiff's car left the light, you started following this car because its lights were not fully turned on.
5. Admit that as Plaintiff's car immediately left it's parked position, it did not squeal the tires.
6. Admit that you followed Plaintiff into his mom's driveways located at 510 N. Orchard Rd. with your lights turned on.
7. Admit that after Plaintiff pulled in his mom's driveway and exited his car, Plaintiff started walking to the side door of his mom's house, which is the entryway to the garage/house.
8. Admit that on June 19, 2025, as Plaintiff reached the side door, you shot the Plaintiff in the back with your issued taser gun.

9. Admit that roughly an hour or so after the incident of Plaintiff being shot in the back, walking away from you parked in his mom's driveway, you called Plaintiff's cell phone at least 2 times to try to talk with Plaintiff, now after 3:00am.
10. Admit that after contacting Plaintiff by phone on June 19, 2021, you called Plaintiff again later that day, or on June 20, 2021, recommending Plaintiff come down to the station and turn himself in by the evening of June 20, 2021, that you would be there to book Plaintiff.
11. Admit that around 7:00 pm on June 20, 2021, Plaintiff came down to the Solvay Police station on his own accord, located at 507 Charles Ave., where he sat in a cell for some time at the station during processing.
12. Admit that on the evening of June 20, 2021, while Plaintiff was sitting in a cell at the station, you arrested, charged, booked and fingerprinted Plaintiff. (see Attachment 1)

Dated: January 15, 2025

All Rights Reserved,

By:   
Richard Sposato, Sui Juris  
c/o 510 N. Orchard Rd.  
Solvay, New York [13209]  
Tel: 315-412-1776  
Email: [richie@nusoundmusic.com](mailto:richie@nusoundmusic.com)

# **ATTACHMENT 1**

1. NYSD No. <i>091327670</i>		2. OBTs No.		New York State ARREST REPORT				3. Case No. 21-349466		4. Ref. No. <i>06059347</i>		4b.						
5. FBI No. <i>34005KBZ</i>		6. Arrest No. <i>21470-43</i>		7. Agency		8. Division/Precinct Patrol				9a.								
9. Name (Last, First, Middle) Sposato, Richard L.		10. Alias / Nickname / Maiden Name (Last, First, Middle) -----				11. Phone Number 315-412-1776												
DEFENDANT INFORMATION	12. Street Number and Name, Building No., Apt. No. 510 N. Orchard Rd.				13. City, State, Zip (C <input type="checkbox"/> T <input type="checkbox"/> V <input checked="" type="checkbox"/> ) Solvay, NY 13209				14. Residence Status <input checked="" type="checkbox"/> Resident <input type="checkbox"/> Foreign Non-Resident <input type="checkbox"/> Non-Resident <input type="checkbox"/> Unk		15. Place of Birth Syracuse, NY							
	16. Date of Birth <i>1961</i>		17. Age <i>59</i>		18. Sex <input checked="" type="checkbox"/> M <input type="checkbox"/> F <input type="checkbox"/> U		19. Race <input checked="" type="checkbox"/> White <input type="checkbox"/> Black <input type="checkbox"/> Asian <input type="checkbox"/> Indian <input type="checkbox"/> Other <input type="checkbox"/> Unknown				20. Ethnic <input checked="" type="checkbox"/> Non Hispanic <input type="checkbox"/> Hispanic		21. Skin <input type="checkbox"/> Light <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Dark <input type="checkbox"/> Other <input type="checkbox"/> Unknown					
	22. Height <i>6' 0"</i>		23. Weight <i>250</i>		24. Hair Black		25. Eyes Bro		26. Glasses <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Contacts <input checked="" type="checkbox"/> Large		27. Build <input type="checkbox"/> Small <input type="checkbox"/> Med <input checked="" type="checkbox"/> Large		28. Marital Status <input type="checkbox"/> Married <input checked="" type="checkbox"/> Single <input type="checkbox"/> Separated <input type="checkbox"/> Divorced <input type="checkbox"/> Widowed <input type="checkbox"/> Unk		29. U.S. Citizen <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown		30. Citizen of USA	
	31. Social Security No. <i>-7925</i>		32. Education <i>13</i>		33. Religion Catholic		34. Occupation Self-employed		35. Employed <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		36. Scars / Marks / Tattoos (Describe) -----							
	37. Arresting Officer Ryan		38. ID No. <i>0021</i>		39. Assisting Officer -----		40. ID No. -----		41. Arrest Date <i>06/20/2021</i>		42. Time 2100hrs		43. Location of Arrest (C <input type="checkbox"/> T <input type="checkbox"/> V <input checked="" type="checkbox"/> ) 507 Charles Ave, Solvay, NY					
	44. Juvenile <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		45. Condition of Defendant At Arrest <input type="checkbox"/> Juv - No Further Processed <input type="checkbox"/> Impaired Drugs <input type="checkbox"/> Mental Dis <input type="checkbox"/> Impaired Auto <input type="checkbox"/> Injnt <input type="checkbox"/> App No/ma		46. Weapon(s) at Arrest -----				47. Co-defendants Arrest No. -----									
	48. Miranda <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		49. Miranda By <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Unk		50. Miranda Dots <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Unk		51. Miranda Time -----		52. Statements <input type="checkbox"/> Written <input checked="" type="checkbox"/> None <input type="checkbox"/> Verbal		53. Status <input type="checkbox"/> Bail / ROR <input type="checkbox"/> Probation		54. Search Warrant <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		55. ID Procedures <input type="checkbox"/> Line Up <input type="checkbox"/> Photo <input checked="" type="checkbox"/> None <input type="checkbox"/> Show Up			
	56. Assignment Court Solvay Court		57. Assignment Judge Presiding		58. Date <i>07/08/2021</i>		59. Time 1600hrs		60. Property <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		61. Evidence <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		61a. Processed By Ryan		61b. Disposition BEAST			
	62. Incident No. <i>21-349466</i>		63. Arrestee Status <input type="checkbox"/> ROR <input type="checkbox"/> Police Bail <input type="checkbox"/> Held <input type="checkbox"/> Cash Bail <input type="checkbox"/> Bail Bond <input checked="" type="checkbox"/> App T/R <input type="checkbox"/> Rel to 3rd Party		64. Bail Amount -----				65. Bondeman -----				66. Photo No. <i>218000</i>					
67. Arrest Type <input type="checkbox"/> PW <input type="checkbox"/> IW <input type="checkbox"/> SUM <input checked="" type="checkbox"/> CIP <input type="checkbox"/> COMP <input type="checkbox"/> OP <input type="checkbox"/> FC <input type="checkbox"/> VOP <input type="checkbox"/> BW <input type="checkbox"/> AW <input type="checkbox"/> OT		68. Warrant No. -----		69. Arrest FOA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		70. Other Agency -----				71. F/P Taken <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
72. Location of Offense (C <input type="checkbox"/> T <input type="checkbox"/> V <input checked="" type="checkbox"/> ) Solvay/Onondaga, NY		73. Offense Date <i>06/19/2021</i>		74. No. Offenders <i>1</i>		75. No. Victims <i>1</i>		76. Return Court Solvay		77. Return Judge Presiding		78. Return Date <i>07/08/2021</i>		79. Time 1600				
80. Defendant/Case TOT Agency -----		80a. Officer's Name -----				80b. ID No. -----				81. Time -----		82. Date -----						
83. Law Article & Section PL 195.05 PL 205.30 VTL 511 VTL 1198 VTL 401 VTL 319		SUB CL CAT -- A M -- A M 2a2 A M -- N 1A -- I 1U -- I		DEG ATT 2 N -- N 2 N -- N -- N -- N		NAME OF OFFENSE Obstructing Gov't Administration 2nd Resisting Arrest AUO 2nd Interlock Restriction Unregistered Motor Vehicle Operating w/o Insurance				CTS 1 1 1 1 1		NCIO CODE -----		VICTIM Age <input type="checkbox"/> Sex <input type="checkbox"/> Handicap -----		ASSOC. NO. <i>72971</i>	TYPE <input type="checkbox"/> APP <input type="checkbox"/> UTT <input type="checkbox"/> OTH	
84. Person Type OT=Other EM=Employer CH=Child PA=Parent AS=Associate		SP=Spouse CD=Co-Defendant SC=School LA=Lawyer PO=Parole Officer PP=Probation Officer				VI=Victim WI=Witness CO=Complainant RP=Religious Person DR=Doctor												
Type -----		Name (Last, First, Middle) -----				Street Number and Name -----				City, State, Zip -----		Phone Number -----						
85. On 6/20/21 a 2100hrs, the defendant was arrested at Solvay PD for the above listed charges. Defendant was issued and released on related UTT's and appearance tickets returnable to Solvay Court on 7/8/21 at 1600hrs.																		
Additional Charges as follows: VTL 1163-B Insufficient Turn Signal VTL 1120-A Failed to Keep Right VTL 375-2a1 No/Inadequate Lights VTL 1102 Failed to Comply with a Lawful Order VTL 306-B Uninspected Motor Vehicle VTL 1180-D Speed in Zone																		
86. Arresting Officer's Signature <i>Officer R</i>		87. ID No. <i>0021</i>		88. Supervisor's Signature <i>Sgt R. L.</i>				89. ID No. <i>9047</i>		90. Page 1 of 1								
90. Arrest Made As A Result Of A SAFIS Latent Print Identification? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown		91. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		92. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>				93. <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>										